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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91207836
Party	Defendant Wolvol Inc
Correspondence Address	MICHAEL STEINMETZ GARSON SEGAL STEINMETZ AND FLADGATE LLP 164 W 25TH STREET #11R NEW, NY 10001 UNITED STATES ms@gs2law.com
Submission	Motion to Extend
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Date	12/04/2014
Attachments	Wolvol DOC120414.pdf(564652 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK
TRIAL AND APPEAL BOARD**

<p>Volvo Trademark Holding AB,</p> <p style="text-align: right;">Opposer,</p> <p style="text-align: center;">v.</p> <p>Wolvol Inc.</p> <p style="text-align: right;">Applicant.</p>	
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Opposition No. 91207836

MOTION TO EXTEND RESPONSE DATES

Applicant, by its attorney, hereby respectfully writes moves to extend trial testimony response dates in this matter by an additional 90 days. Applicant has not filed any motions to extend the dates in this proceeding. On June 19, 2014 Opposer filed and was subsequently granted an additional 90 day extension to the trial dates because Opposer stated that its employees would be “out of the office for much of July and August, and will also be travelling for business in September”. Applicant now requires a 90 day extension of time to prepare for Opposer’s deposition on written questions and related document dump.

On November 12, 2014, after not producing a single page in discovery, Opposer served via Fedex 175 deposition on written examination questions, and 77 exhibits consisting of what appears to be over 1500 pages. The exhibits are mostly company advertising paraphernalia, and multiple lawsuits and WIPO proceedings that will require time to research. While preparation for a deposition on written questions always entails a large amount of time, the current state of this new production makes it near impossible for Applicant to properly research and prepare for the deposition on written questions without an extension of time. In addition, Applicant is in the midst of the busiest retail holiday season and is unavailable for much of the next two months. An extension is therefore needed to ensure Applicant has a proper amount of time to prepare questions for the deposition on written questions that is set to take place shortly out of the United States, in the country of Sweden.

On Nov. 20, 2014, the board suspended this proceeding to allow sufficient time to complete the testimonial deposition on written questions. Applicant requested the consent of Opposer in this application, which consent was denied. This motion is not made for the purpose of delay. Accordingly, Applicant requests that Applicant's request for a 90-day trial date extension be granted.

Dated: December 4, 2014



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CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing **EXHIBIT** MOTION TO EXTEND RESPONSE DATES was made on this 4th day of December 2014, by delivering a true and correct copy of the same by First Class Mail to the following address:

Leigh Ann Lindquist
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